

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Keiya Peel : No. 18-14207-MDC
Debtor :

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtor, by attorney David M. Offen, has filed a Motion to Modify Plan in Consideration of the CARES Act.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **June 17, 2021**, you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
Office of the Clerk
U.S. Bankruptcy Court
Suite 400
900 Market Street
Philadelphia, Pa. 19107

If you mail your answer to the Bankruptcy Clerks office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's Attorney
David M. Offen, Esquire
Suite 160 West, The Curtis Center
601 Walnut Street
Philadelphia, Pa. 19106
215-625-9600
Fax 215-625-9734

William C. Miller, Trustee
PO Box 1229
Philadelphia, PA 19105

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an Order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Magdeline D. Coleman, Chief United States Bankruptcy Judge on **July 1, 2021 at 11:00 AM in Courtroom #2**, United States Bankruptcy Court, 900 Market Street, 2nd Floor.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

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ORDER

AND NOW, this _____ day of _____, 2021,
upon consideration of the Motion to Modify Plan After
Confirmation, it is hereby ORDERED, that the Debtor's confirmed
plan is modified and the modified plan filed as a proposed
modified plan on the docket shall be the new plan.

HONORABLE MAGDELINE D. COLEMAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

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MOTION TO MODIFY PLAN AFTER CONFIRMATION
IN CONSIDERATION OF THE CARES ACT

Debtor, by attorney David M. Offen, makes the following Motion to Modify Plan After Confirmation and in support hereof states as follows:

1. Debtor filed a Chapter 13 Petition and Plan with this Court on June 25, 2018.
2. The Debtor's Confirmed Plan provided for a base plan in the amount of \$45,175.00 to be paid in over a 60 month period.
3. The Debtor's family income was impacted by Covid 19 however Debtor is able to continue making Trustee payments.
4. The Trustee has filed a motion to dismiss.
5. The Debtor wishes to continue making Trustee payments under the plan.
6. Allowing the Debtor to extend the plan to cover the monies owed to the Trustee.
7. The Debtor has paid a total of \$27,737.50 into the Chapter 13 Trustee over 36 months.
8. The Debtor's modified plan will provide for monthly payments in the amount of \$456.00 per month beginning in July of 2021 and continuing for 48 months for a total of 84 months.
9. Debtor respectfully requests her Chapter 13 plan be modified to allow the Debtor to get caught up on the defaulted balance over the remaining length of the plan and the difference

in the money owing to the mortgage company.

WHEREFORE, Debtor, by Attorney, respectfully requests that Your Honorable Court enter an Order to reflect that the proposed Modified Chapter 13 Plan filed on the docket is hereby approved with a new base amount of \$49,625.50.

Date:6/2/21

/s/ David M. Offen
David M. Offen
Attorney for Debtor
601 Walnut Street
The Curtis Center
Suite 160 West
Philadelphia, PA 19106
215-625-9600

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Modify Plan After Confirmation was served on 6/2/21, on the Chapter 13 Standing Trustee, William C. Miller, Esq., by electronic mail, and upon all creditors by first class mail.

Dated: 6/2/21

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)
Suite 160 West, Curtis Ctr.
601 Walnut Street
Philadelphia, PA 19106
215-625-9600